REMARKS

Claims 1-7 and 10-24 are pending in the present application. Claims 1, 7, 10, 16, 22 and 24 are amended. Support for the amendment for claims 1, 10, 16 and 22 is found in the specification on page 7, lines 13-15, and page 11, line 21, through page 12, line 3. Support for the amendment in claim 7 is found in the specification on page 7, lines 10-21, and on page 13, line 21, through page 15, line 4. Claims 8, 9, and 25 are cancelled. Reconsideration of the claims is respectfully requested.

Amendments are made to the specification for clarification. No new matter is added by any of the amendments to the specification.

I. Interview with Examiner

On April 7, 2005, the examiner and the undersigned agent discussed several proposed amendments for claim 1 and claim 7 and the rejection of the claims based on *Pringle* and *Moser*. No agreement was reached.

II. 35 U.S.C. § 102, Anticipation

The Office Action rejects claims 1-7 and 10-24 under 35 U.S.C. § 102 as being anticipated by *Pringle et al*, Automated Translation of Annotated Text Based on the Determination of Locations for Inserting Annotation Tokens and Linked Ending, End-of-Sentence or Language Tokens, U.S. 6,470,306 B1 (Oct. 22, 2002) (henceforth *Pringle*). The Office Action only addresses claims 1-7 in the Detailed Action section; however, the statement of the rejection states that all claims 1-7 and 10-24 are rejected. Therefore, the Applicant assumes that claims 10-24 are rejected for the same reasons stated for claims 1-7. This rejection is respectfully traversed.

With regard to claims 1, 10, 16, and 22, Applicant amends the claims to provide further clarification. Furthermore, since claims 2-7, 11-15, 17-21, and 23-24 inherit the subject matter recited in claims 1, 10, 16, and 22, claims 2-7, 11-15, 17-21, and 23-24 is in condition for allowance.

As to claim 1, the Office Action states:

> As per claim 1, Pringle et al teach a method for chaining a first translation engine and a second translation engine, comprising (figures 10-18):

> receiving, in the first translation engine, a source text in a first natural language; (figure 10, his source document 290, his text producer 206. col. 19, lines 27-30);
>
> using the first translation engine to translate the source text into an intermediate text in a second natural language and to annotate the intermediate text; (his tokenizer 210, his sentence ender 212, and his sentence retriever 214, his annotation tokens Dbase 228, col. 20, lines 41-52; figure 12, his tokenizer 210, col. 22, lines 24);
>
> receiving, in the second translation engine, the annotated intermediate text; (his translator 216, col. 20, lines 52-59; col. 22, lines 25-50); and
>
> using the second translation engine to translate the annotated intermediate text into a third natural language (his translator 216 and his output interface 14, col. 20, lines 52-59,

Office Action dated January 13, 2005, pages 2-3.

Regarding claim 1, the Office Action fails to establish a *prima facie* case of anticipation because *Pringle* does not show all the limitations of claim 1. A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 if each and every element of the claimed invention is identically shown in the single reference and are arranged as in the claim under review. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining "patentability of the invention over prior art." *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994).

In this case, the Office Action fails to show that each and every element of claim 1 is anticipated by the reference. Claim 1 (emphasis added) provides as follows:

> 1. A method for *chaining a first translation engine* and *a second translation engine*, comprising:
>
> receiving a request to translate a source text from a source natural language to a target natural language;
>
> receiving, in the first translation engine, the source text in a source natural language;
>
> using the first translation engine *to translate the source text into an intermediate text in an intermediate natural language and to annotate the intermediate text;*
>
> *receiving, in the second translation engine, the annotated intermediate text;*

using the second translation engine to translate the annotated intermediate text into a target natural language to form a target text; and returning the target text as a response to the request.

Pringle does not show the above recited features. Namely, *Pringle* does not show a method for chaining a first translation engine and a second translation engine using the first translation engine to translate the source text into an intermediate text in a second natural language and to annotate the intermediate text; receiving, in the second translation engine, the annotated intermediate text; and using the second translation engine to translate the annotated intermediate text into a third natural language.

The Office Action asserts that *Pringle* does show these limitations by referring generally to figures 10-18 and various sections of the written description supporting the respective figures. *Pringle* depicts a method for translating a previously annotated source document to a target document while preserving the annotations from the source document and inserting the corresponding annotations into the target document. *Pringle*, figures 10-18; col. 2, lines 29-34; and col. 3, lines 15-21. However, neither the figures themselves nor the written descriptions supporting the figures demonstrate a method for chaining a first translation engine and second translation engine using the first translation engine *to translate the source text into an intermediate text in an intermediate natural language and to annotate the intermediate text; receiving, in the second translation engine, the annotated intermediate text;* and *using the second translation engine to translate the annotated intermediate text into a target natural language to form a target text.*

For example, Figure 10 is the general embodiment of the automated natural language translation system for the *Pringle* reference. Figure 10 is as follows:

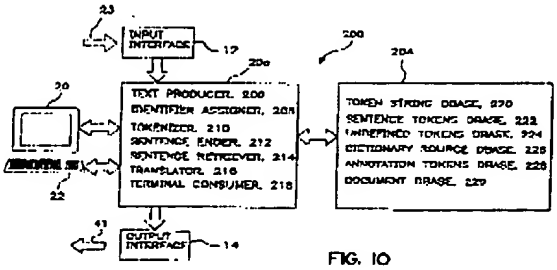


FIG. 10

Pringle, figure 10.

Figure 10 illustrates the translation between two natural languages, such as English to Japanese or Spanish in an exemplary embodiment, using a token based annotation system. *Pringle*, col. 19, line 13, through col. 20, line 36. The token based system is a method for identifying the words, phrases, and characters in the source document in order to facilitate translation into the target language. *Pringle*, col. 19, lines 30-49. However, the token based system is a form of annotation and not a natural language like that found in the claimed invention, which uses a natural language as an intermediary to chain the source language to the target language. In the presently claimed invention, annotations are used to facilitate the accuracy of the chaining process; however, the actual chaining from the source to the target language utilizes an intermediate natural language along with annotations. Thus, *Pringle* simply fails to teach or fairly suggest an intermediate text in a natural language.

Furthermore, *Pringle* further fails to anticipate claim 1, because *Pringle* requires a direct translation for every conceivable pair of languages which is contrary to the claimed invention. *Pringle* teaches, upon receiving a translation request, using a single translation engine to directly translate the source natural language to the target natural language. *See Pringle*, col. 19, line 13 through col. 20, line 36. However, in order to translate text directly, *Pringle* would inherently require the development of a translation engine for every conceivable pair of languages. The task of creating so many translation engines is daunting and impractical, especially when a user requests a translation between two languages that are rarely combined together.

On the other hand, the claimed invention allows for the translation of two languages that are rarely combined together, such as Russian and Swahili. Instead of directly translating between the two natural languages, an intermediate natural language that is common to both Russian and Swahili would facilitate the translation. In other words, the claimed invention may include a translation engine that translates from Russian to English and another translation engine that translates from English to Swahili. Using English as the intermediate natural language, the claimed invention chains Russian to Swahili. Consequently, the claimed invention only needs to maintain a translation between two combinations of languages (Russian to English and English to Swahili), and avoids having to develop a specialized translation engine for a third combination

(Russian to Swahili). *Pringle* does not teach or suggest the reduction of extra translation engines and using an intermediate natural language to translate two remote languages. Thus. *Pringle* fails to anticipate claim 1.

Additionally, figures 11-18 of the *Pringle* reference further support the position that *Pringle* does not anticipate the claimed invention. Figures 11-18 illustrate the remaining steps for translating the annotated source document to a target document while preserving the annotations from the source document and inserting the corresponding annotations in the target document. Like figure 10, figures 11-18 and the supporting written description do not utilize a natural language as an intermediary for chaining the first and third languages. Figures 11-18 utilize a form of annotation to facilitate translation between the source and target languages. Therefore, figures 11-18 and the supporting written description do not anticipate claim 1. Accordingly, *Pringle* does not anticipate claim 1.

Since independent claim 1 is representative of independent claims 10 and 16, with regard to similarly recited subject matter, the arguments set forth for claim 1 also apply to claims 10 and 16. Accordingly, *Pringle* does not anticipate claims 10 and 16.

The Office Action also rejects independent claim 7 as being anticipated by *Pringle*. Claim 7 is amended to include additional limitations to provide further clarification. Claim 7 is amended to include the limitations of claims 8 and 9 as disclosed in the original application.

As to claim 7, the Office Action states:

> As per claim 7, (see rejection of claim 1 above) Pringle et al further teaches in figure 11, the chaining the tokenizer 210 and the translator 216 to complete the translation from the source language to an annotated language (intermediate language) and from the annotated language to target language.

Office Action dated January 13, 2005, pg. 3.

Regarding claim 7, the Office Action fails to establish a *prima facie case* of anticipation, because *Pringle* does not show all the limitations of claim 7. Claim 7 (emphasis added) as amended provides as follows:

> 7. A method, in a server computer, for *chaining applications*, comprising:

receiving, at a chaining module, a request from a requesting application for a service and an option associated with the chaining module, *wherein the option identifies the service by a service name and wherein the option specifies use of a linguistic annotation language*;

receiving *a properties file, wherein the properties file associates the service name with a series of applications*;

receiving *the series of applications corresponding to the chaining module, wherein the series of applications comprises a first translation engine and a second translation engine, wherein the first translation engine translates from a source natural language to an intermediate natural language, and wherein the second translation engine translates from the intermediate natural language to a target natural language;*

executing the first translation engine and the second translation engine in order and passing the output of the first translation engine to the input of the second translation engine, wherein the output of the first translation engine is annotated *with the linguistic annotation language* and *wherein the linguistic annotation language is a markup language*; and

returning a result of the service to the requesting application.

Pringle does not show the recited features. Namely, *Pringle* does not show a method, in a server computer, for *chaining applications*, comprising: receiving, at a chaining module, a request from a requesting application for a service and an option associated with the chaining module, *wherein the option identifies the service by a service name and wherein the option specifies use of a linguistic annotation language*; receiving *a properties file, wherein the properties file associates the service name with a series of applications*; receiving *the series of applications corresponding to the chaining module, wherein the series of applications comprises a first translation engine and a second translation engine, wherein the first translation engine translates from a source natural language to an intermediate natural language, and wherein the second translation engine translates from the intermediate natural language to a target natural language; executing the first translation engine and the second translation engine in order and passing the output of the first translation engine to the input of the second translation engine*, wherein the output of the first translation engine is annotated *with the linguistic annotation language* and *wherein the linguistic annotation language is a markup language*; and returning a result of the service to the requesting application.

The Office Action asserts that *Pringle* does show these limitations by referring to the tokenizer (item number 210) and the translator (item number 216) in figure 11. Figure 11 is as follows:

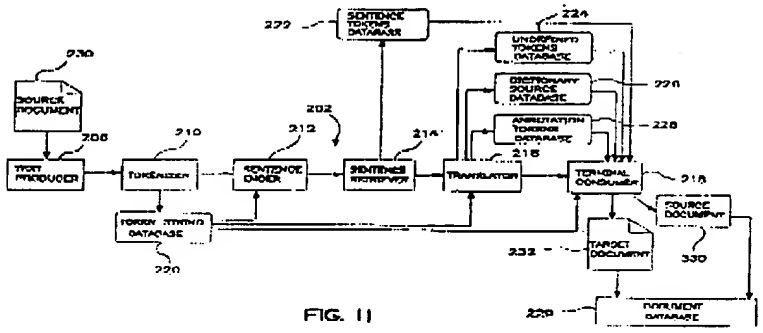


FIG. 11

Pringle, figure 11.

The written description supporting Figure 11 (emphasis added) is as follows:

> [Col. 20, line 37 to col. 21, line 3] Referring to FIG. 11, shown is a block diagram illustrating, in one embodiment, the flow of a token string through the system 200 for performing automated translation and preservation of annotations in text according to FIG. 10. As shown in this figure, a source document 230 is converted to a data string and transmitted from the text producer 20 to the *tokenizer 210*, at which point the token string is formed and stored in the token string database 220. The token string is then transmitted to the sentence ender 212 which inserts appropriate tokens in the token string representing the end of the sentence or section. These tokens are hereinafter referred to as end-of-sentence tokens. The token string is then transmitted to the sentence retriever 214, which ensures that all the tokens in each sentence or section are linked on a sentence-by-sentence basis in the sentence tokens database 222. The token string is then passed to the *translator 216* where a translation is performed and first language word tokens are transformed into second language word tokens. Tokens that are not understood by the *translator 216* are passed through without being translated or otherwise changed. Such tokens are considered undefined word tokens, and the tokens or their identifiers can then be stored in the optional undefined tokens database 224. Additionally, the first language and second language word tokens or their identifiers are cross-referenced and stored in the dictionary source database 226, and the annotation tokens or their identifiers are stored in the annotation tokens database 228. The token string is then passed to the terminal consumer 218 which receives the second language word tokens and uses the token identifiers stored in the token string database 220 to ensure that second language word tokens are properly disposed in the string. The terminal consumer then transforms the second language word tokens into byte tokens and creates the target document 232.

Pringle, col. 20, line 37 to col. 21, line 3.

Figure 11 shows the flow of translating text from a source document that has been identified with a token from a first natural language to a second natural language. *Pringle*, col 20, lines 37-41. The tokenizer, item 10, is a means to convert the natural language text to a token form. The translator, item 216, takes the tokenized version of the source language text and converts the tokenized version to the tokenized version of the target language. Nevertheless, even though the tokenization system is a means to facilitate translation, the tokenization translation system is not a chaining module as recited in the instant claims.

A chaining module in the present invention is a specific code that allows clients to easily and quickly identify which natural language translation engines to use. Without the chaining module, an application would have to individually request each translation engine. In other words, if an application wanted a document translated from German to French and no direct translation existed, the application would have to first make a request for a translation from German to an intermediate natural language and then make a second request for a translation from the intermediate natural language to French. With the presently claimed chaining module, a short hand identification for each combination of translation engines can be used. The short hand identification may be a customized name or a property keyword that flags the particular translation engine. Thus, as in the above example, if the short hand identification of German to the intermediate natural language, English, is identified as "deen" and the short hand identification of the intermediate language to French is "enfr," an application only needs to call "deen enfr" as an option in a single request to activate the chaining module to translate the source document from German to the target document in French.

On the contrary, *Pringle* does not address an option to facilitate the translation from the source to the target natural language by way of an intermediate natural language. Instead, as indicated above, *Pringle* proposes only a means to directly translate using a tokenized system. *Pringle* does not address a short hand method of coding as part of the chaining process. *Pringle* simply fails to teach or suggest a method for chaining applications. Thus, *Pringle* does not anticipate claim 7.

Moreover, *Pringle* further fails to teach or suggest a series of applications comprising a first translation engine and a second translation engine. As indicated above,

Pringle describes a token based system of translation that facilitates direct translation using a single translation engine. On the other hand, the claimed invention utilizes a first translation engine and a second translation engine to facilitate translation between the target and source language. The first translation engine uses a source and intermediate natural language, and, likewise, the second translation engine only utilizes the intermediate and target natural language. The *Pringle* system does not teach the use of a first translation engine and a second translation engine. Therefore, *Pringle* does not teach or suggest all the limitations of claim 7.

Furthermore, *Pringle* fails to teach or suggest a chaining module wherein the output of the first translation is annotated with a linguistic annotation language and wherein the linguistic annotation language is a markup language. *Pringle*, as stated above, does not teach or suggest a chaining module that allows for short hand identification of different translation engines. *Pringle* further does not teach or suggest a method for chaining applications comprising a chaining module that allows for the conjunctive use of a linguistic annotation language or markup language as part of the translation process. *Pringle* simply does not teach or suggest a method, in a server computer, for *chaining applications*, comprising: receiving, at a chaining module, a request from a requesting application for a service and an option associated with the chaining module, *wherein the option identifies the service by a service name and wherein the option specifies use of a linguistic annotation language*; receiving *a properties file, wherein the properties file associates the service name with a series of applications*; receiving *the series of applications corresponding to the chaining module, wherein the series of applications comprises a first translation engine and a second translation engine, wherein the first translation engine translates from a source natural language to an intermediate natural language, and wherein the second translation engine translates from the intermediate natural language to a target natural language; executing the first translation engine and the second translation engine in order and passing the output of the first translation engine to the input of the second translation engine*, wherein the output of the first translation engine is annotated *with the linguistic annotation language* and *wherein the linguistic annotation language is a markup language*; and returning a result of the service to the requesting application. Thus, *Pringle* does not teach or suggest

all the limitations of claim 7. Accordingly, the Office Action fails to establish a *prima facie* case of anticipation in rejecting claim 7.

Since claim 7 is representative of claim 24 with regard to similarly recited subject matter, the arguments set forth for claim 7 also apply to claim 24. Accordingly, the Office Action fails to establish a *prima facie* case of anticipation in rejecting claim 24.

Additionally, the Office Action rejects claims 2-3 as being anticipated by *Pringle*. However, as indicated above, the same analysis regarding the use of linguistic annotation language and markup language in relation to the chaining module applies for these claims. *Pringle* fails to teach or suggest using a linguistic annotation language or a markup language in conjunction with the translation from the source to the target language. Instead, *Pringle* replaces the linguistic annotation language or markup language with the tokenization system and uses the tokenization system to translate the source to the target natural language.

Claim 7 as amended includes all the claim limitations in claims 8 and 9 as originally filed. Since the subject matter of claims 2 and 3 is similar to that of claims 8 and 9 and since the limitations of claims 8 and 9 are now in claim 7, all arguments regarding claims 2 and 3 below are also applied to claim 7 as amended.

As to claims 2-3, the Office Action states:

> As per claims 2 and 8, Pringle et al teach wherein the intermediate text is annotated using a linguistic annotation language (his tokenizer 210 and figure 13, his KTML markup language, col. 23, line 35 to col. 24, line 56).
>
> As per claims 3 and 9, Pringle et al teach wherein the linguistic annotation language is a markup language (col. 23, lines 35-65, his HTML markup language).

Office Action dated January 13, 2005, pg. 3.

Regarding claims 2-3, the Office Action fails to establish a *prima facie case* of anticipation, because *Pringle* does not show all the limitations of the respective claims. Claims 2-3 (emphasis added) provides as follows:

> 2. The method of claim 1, wherein the intermediate text *is annotated using a linguistic annotation language.*
>
> 3. The method of claim 2, wherein the *linguistic annotation language is a markup language.*

The Office Action asserts that *Pringle* shows these limitations by referring to figure 13 and various sections of the written description. However, figure 13 and the cited text further supports Applicant's position that *Pringle* does not teach or suggest all the limitations of the claimed invention. Specifically, a portion of the cited text states that if the system identifies a HTML markup, then the *Pringle* invention will substitute the HTML character with a different tag or token to further translation. *See Pringle*, col. 23, lines 48-67. Instead, the HTML is removed from the translation process altogether. Therefore, *Pringle* does not teach or suggest the use of a linguistic annotation language or a markup language to annotate the intermediate text. Accordingly, the Office Action fails to assert a *prima facie* case of anticipation rejection for clams 2-3 and 8-9.

Since claims 2-6 depend on independent claim 1, the same distinctions between *Pringle* and the claimed invention apply for claims 2-6 as well. Additionally, since claims 10-24 recite subject matter addressed above with respect to claim 1 and claim 7, claims 10-24 are allowable for similar reasons. Accordingly, *Pringle* does not anticipate claims 1-7 and 10-24.

Furthermore, *Pringle* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Pringle* actually teaches away from the presently claimed invention because it teaches a method to translate between two languages using a tokenized annotation system as opposed to a translation using an intermediate natural language as in the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement *Pringle*, one of ordinary skill in the art would not be led to modify *Pringle* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Pringle* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicant's disclosure as a template to make the necessary changes to reach the claimed invention.

The Office Action also rejects claims 1-7 and 10-24 under 35 U.S.C. § 102 as being allegedly anticipated by *Moser et al.*, Method and Apparatus for Performing Full Bidirectional Translation Between a Source Language and a Linked Alternative Language, U.S. Patent 6,275,789 (Aug. 14, 2001). This rejection is respectfully traversed.

As to claim 1, the Office Action states:

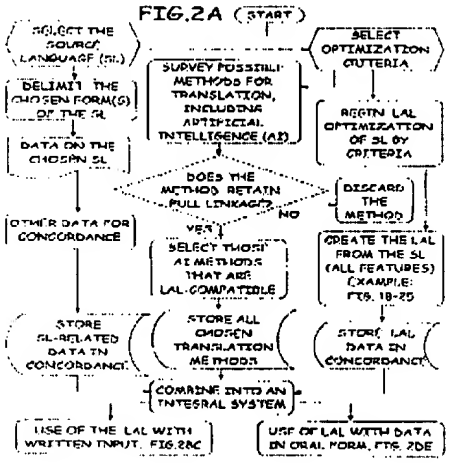
> As per claim 1, Moser et al teach teach a method for chaining a first translation engine and a second translation engine, comprising 9 figures 2a-2d);
>
> receiving, in the first translation engine, a source text in a first natural language; (his source language (SL))
>
> using the first translation engine to translate the source text into an intermediate text in a second natural language and to annotate the intermediate text; (figure 2b, his source language is translated to the Linked Alternative Language (LAL))
>
> receiving, in the second translation engine, the annotated intermediate text; (figure 2c, his fully edited (annotated text in the LAL); and
>
> using the second translation engine to translate the annotated intermediate text into a third natural language (the use of the traditional MT to translate the LAL to a third language).

Office Action dated January 13, 2005, pages 3-4.

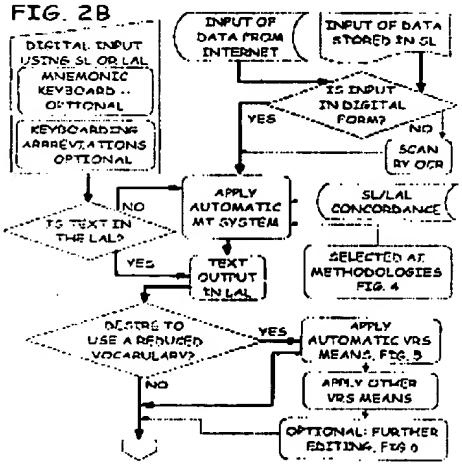
Regarding claim 1, *Moser* does not show all the limitations of claim 1. More particularly, *Moser* does not show a method of chaining a first translation engine and a second translation engine using the first translation engine to translate the source text into an intermediate text in a second natural language.

The Office Action asserts that *Moser* does show these limitations referring generally to figures 2a-2d and various terms within the reference. *Moser* describes a system for improving the written and spoken translation of languages by means of a linked alternative language (LAL) generated by the source language. *See Moser*, col. 4, line 61 through col. 5, line10. The LAL disclosed in *Moser* is a "specially designed language *form* that is quite different in outward format from its source language." *Moser*, col. 4, line 66 through col. 5, line 1 (emphasis added). The LAL is formulated by taking recognizable "roots" of the word and transforming the "root" into a global form, in other words a form that can be recognized and defined appropriately in many languages. *See Moser*, col. 8, lines 4-9, and col. 30, lines 39-53. The LAL is essentially an optimization of the source natural language and a *form* of a language but *not* a natural language in and of itself. *See Moser*, col. 8, lines 4-9, and col. 30, lines 39-53.

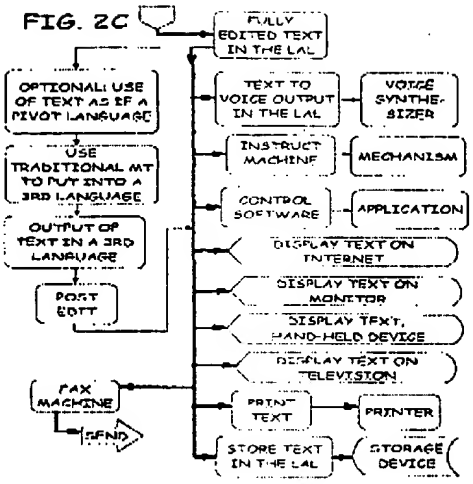
Figures 2a-2d describe the overall method and apparatus for managing "human communications by the generation and use of a linked alternative language." *Moser*, col. 7, lines 64-65. Figures 2a-2d are as follows:



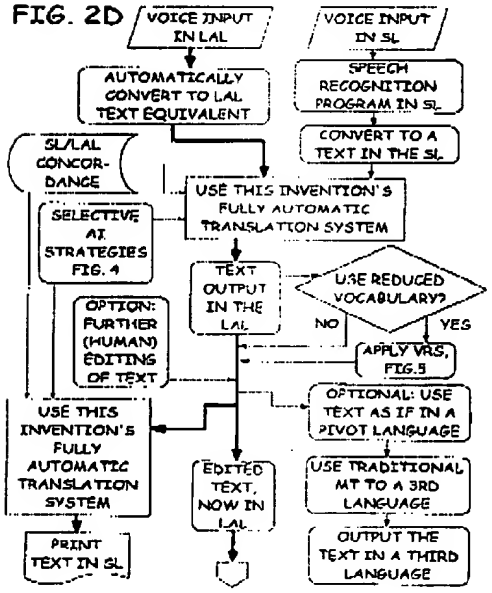
Moser, figure 2a.



Moser, figure 2b.



Moser, figure 2c.

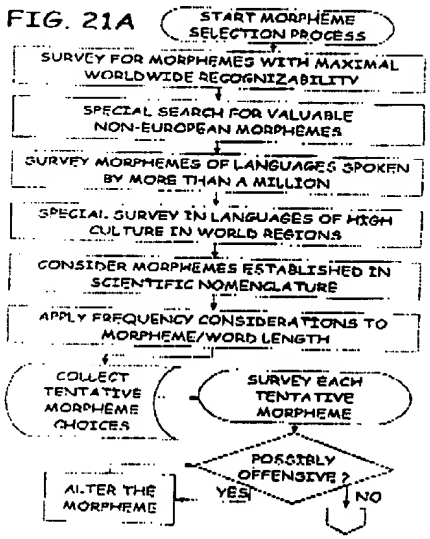


Moser, figure 2d.

Figures 2a-2d show the process of translating between the source and target language using a linked alternative language (LAL). In order to create the LAL, the system replaces the source language vocabulary with new vocabulary that has been

optimized and customized to meet communication needs of the target customer. *See Moser*, col. 8, lines 4-9.

Although Figure 21A is not cited in the rejection, Figure 21A of the *Moser* reference is the best illustration of the LAL translation and optimization of the "root." Figure 21A is as follows:



Moser, figure 21A.

Figure 21A illustrates the replacement of morphemes, in other words "roots," with the optimized global form of the root. As illustrated by the figure, optimized "roots" are taken from sources, such as scientific nomenclature, which when actually applied to the source language alters the source language and transforms the source language essentially to "non-natural" language.

On the contrary, the claimed invention uses a natural language for translation. The intermediate language used to translate the source language to the target language is a natural language. The claimed invention does not invent another optimized language, but utilizes an existing natural language.

Additionally, *Moser* does not teach or suggest the limitations of claim 1 simply because a term used in *Moser* has the same acronym as a term used in the claimed invention. For example, a reference does not teach an "asynchronous transfer mode" simply because the reference uses the acronym ATM but uses the ATM to refer to an

"automatic teller machine." Likewise, *Moser* utilizes the acronym LAL to refer to a Linked Alternative Language while instant claims recite a Linguistic Annotation Language. The LAL in the claimed invention is a method of marking the language and is not synonymous with the optimized language illustrated within *Moser*. Therefore, the Office Action fails to show that *Moser* anticipates a method of chaining a first translation engine and a second translation engine using the first translation engine to translate the source text into an intermediate text in a second natural language. Accordingly, *Moser* does not anticipate claim 1 of the present invention.

In similar fashion, the Office Action rejects claim 7 as being allegedly anticipated by *Moser*. As to claim 7, the Office Action states:

> As per claim 7, Moser et al teach a method for chaining applications (figure 2a-2d), comprising:
>
> receiving a request for a service associated with a chaining module; (a request for translation and use his chaining of the MT engine, one MT for translating the source language to Linked Alternative Language (LAL) and the other MT for translating from the LAL to a third language);
>
> receiving a series of applications from an option corresponding to the chaining module, wherein the series of applications comprises a first translation engine (figures 2a, his translation engine that translates the source language to the Linked Alternative language (LAL)); and
>
> a second translation engine; (figure 2c, his edited text in the LAL language is translated using traditional MT to a third language);
>
> executing the first translation engine and the second translation engine in order and passing the output of the first translation engine to the input of the second translation engine, wherein the output of the first translation engine is annotated (figure 2a-2s, his use of a first translation engine to translate the source language to LAL language and the use of another translation engine to translate the edited (annotated) LAL language to a third language, see figure 3d for annotations and figure 16d, his annotate LAL text).

Office Action dated January 13, 2005, page 5.

Regarding claim 7, *Moser* does not show all the limitations of claim 7. Namely, *Moser* does not show a method, in a server computer, for *chaining applications*, comprising: receiving, at a chaining module, a request from a requesting application for a service and an option associated with the chaining module, *wherein the option identifies*

the service by a service name and wherein the option specifies use of a linguistic annotation language; receiving *a properties file, wherein the properties file associates the service name with a series of applications*; receiving *the series of applications corresponding to the chaining module, wherein the series of applications comprises a first translation engine and a second translation engine, wherein the first translation engine translates from a source natural language to an intermediate natural language, and wherein the second translation engine translates from the intermediate natural language to a target natural language; executing the first translation engine and the second translation engine in order and passing the output of the first translation engine to the input of the second translation engine*, wherein the output of the first translation engine is annotated *with the linguistic annotation language* and *wherein the linguistic annotation language is a markup language*; and returning a result of the service to the requesting application.

The Office Action asserts that *Moser* does show these limitations by referring to figures 2a-2d and various terms within the reference. The same figures are used in the discussion for claim 1 and are shown above. As indicated above, figures 2a-2d describe the overall method and apparatus for managing "human communications by the generation and use of a linked alternative language." *Moser*, col. 7, lines 64-65. Figures 2a-2d show the process of translating between the source and the target language using a linked alternative language (LAL).

As indicated above with respect to *Pringle, Moser* likewise does not present a chaining module system that allows for the short hand identification of which natural language translation engine to use. Instead, *Moser* presents a means to translate between source and target languages using a linked alternative language that is not a natural language. *Moser* never mentions a short hand identification, or option, for identifying a series of two or more translation engines. *Moser* teaches a system of translation using a non-natural language. *Moser* does not suggest translation engines that are comprised of natural languages only. Thus, *Moser* does not anticipate all the limitations of claim 7.

Since claims 2-6 depend from claims 1, the same distinctions between *Moser* and the claimed invention in claims 1 apply for these claims. Additionally, claims 10-24 are of the same scope and subject matter as claims 1-7, and the same distinctions can be

made for these claims. Accordingly, it is respectfully urged that the rejection of claims 1-7 and 10-24 under 35 U.S.C. § 102 is overcome.

Furthermore, *Moser* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Moser* actually teaches away from the presently claimed invention because it teaches a method to translate between two languages using an optimized translation language as opposed to a translation using an intermediate natural language as in the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement *Moser*, one of ordinary skill in the art would not be led to modify *Moser* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Moser* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicant's disclosure as a template to make the necessary changes to reach the claimed invention.

III. Conclusion

It is respectfully urged that the subject application is patentable over *Pringle* and *Moser* and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

Stephen R. Tkacs
Reg. No. 46,430
Yee & Associates, P.C.
P.O. Box 802333
Dallas, TX 75380
(972) 385-8777
Agent for Applicant

SRT/hs